

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----X	:	
CROWN CLOTHING CORPORATION,	:	Civil Action No. 05-10049 (NG)
Plaintiff	:	
	:	
v.	:	
	:	
RANDCORE, INC.,	:	
RAND INTERNATIONAL TRADING,	:	
INC., ANDRE BERNARD, AND	:	
RONALD BERNARD,	:	
Defendants	:	
-----X	:	

MOTION OF DEFENDANTS RANDCORE, INC.,
RAND INTERNATIONAL TRADING, INC.,
AND ANDRE BERNARD TO DISMISS THE COMPLAINT

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendants Randcore, Inc., Rand International Trading, Inc., and Andre Bernard (collectively, "Defendants") respectfully move that the Court dismiss the Plaintiff's complaint for lack of personal jurisdiction. Defendants base their motion on the relevant allegations of the Amended Complaint and on the affidavit of Andre Bernard filed herewith.

For a more detailed statement of the grounds for their motion, Defendants respectfully refer the Court to the accompanying memorandum of law, which is incorporated here by reference.

REQUEST FOR ORAL ARGUMENT

Defendants believe that oral argument may assist the Court in the disposition of this motion and request a hearing.

Dated: Boston, Massachusetts
January 25, 2005

Respectfully submitted,

Defendants Randcore, Inc., Rand
International Trading, Inc., Andre Bernard,
and Ronald Bernard

By their Attorneys,

SUGARMAN, ROGERS, BARSHAK
& COHEN, P.C.

By: /s/ Jeffrey S. Stern
Jeffrey S. Stern
101 Merrimac Street
Boston, Massachusetts 02114
(617) 227-3030
BBO No. 479460

Local Rule 7.1(a)(2) Certificate

The undersigned certifies that counsel have conferred and have attempted in good faith to resolve or narrow the issues raised by the within motion, but were unable to do so.

/s/ Jeffrey S. Stern
Jeffrey S. Stern

CERTIFICATE OF SERVICE

I, Jeffrey S. Stern, hereby certify that on the 25th day of January, 2005, I served the within notice of motion by mailing a copy thereof, postage prepaid, to the following counsel of record:

John C. Wyman, Esq.
Murtha Cullina LLP
99 High Street, 20th Floor
Boston, Massachusetts 02110

Gary R. Greenberg, Esq.
Greenberg Traurig
One International Place
Boston, Massachusetts 02110

/s/ Jeffrey S. Stern
Jeffrey S. Stern